

Common Dangerous Waste Compliance Issues

| Common Compliance Issues | | Best Management Practices | References |
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| Waste Designation – WAC 173-303-170(1)(a) and by reference -070 | | | |
| Waste streams not designated: wastes must be designated to determine if they are a dangerous waste. | Determine if wastes are a dangerous waste by using the Washington Dangerous Waste Designation Tool, a downloadable EXCEL spreadsheet that helps dangerous waste generators through the process of identifying and assigning waste codes to wastes: www.ecy.wa.gov/programs/hwtr/manage_waste/des_intro.html . | Managing wastes: www.ecy.wa.gov/programs/hwtr/managewaste.html . | |
| Spill Management – WAC 173-303-145(3) | | | |
| Spilled materials: spills, leaks, or drips are wastes, unless reusable, and must be cleaned up, stored in appropriate containers, designated, labeled and properly disposed. | <ul style="list-style-type: none">• Store appropriate emergency spill material near areas where wastes are being collected or transferred from one container to another.• Clean up spills promptly using absorbent pads or absorbent granules for liquid spills and store in compatible containers.• Designate the spilled material and properly label container to indicate what's inside the container, if it is a dangerous waste or non-hazardous waste, the associated hazard(s), and the date collected.• Protect floor and sink drains from accidental spills.• Don't use water to mop up spills or to wash down drains. | Managing spills: www.ecy.wa.gov/programs/hwtr/manage_waste/spills.html . | |
| Container/Containment Management – WAC 173-303-200 | | | |
| Poor condition, (1)(b) and by reference 630(2) and 630(5)(b): All dangerous waste containers must be in good condition (no rust, bulging, etc.) and handled to prevent rupture or leaks. | <ul style="list-style-type: none">• Always check accumulation containers before use to assure that they can be securely closed and are in overall good condition.• Only collect compatible waste types in the same container. <i>Example: acids with acids, bases with bases, organic solvents.</i>• Use containers that are compatible with the waste. <i>Example: use metal drums for collecting waste organic solvents; use polyethylene for acids and bases.</i>• Use labels that are easy to read, identify as "Dangerous Waste," name of the waste, the nature of the hazard | Appropriate containers: www.ecy.wa.gov/programs/hwtrmanage_waste/containers.html Secondary containment: www.ecy.wa.gov/programs/hwtrmanage_waste/secondary_containment.html Accumulation areas: www.ecy.wa.gov/programs/hwtrmanage_waste/accumulation.html | |
| Incompatible wastes and containers, (1)(b) and by reference 630(4): Do not mix incompatible waste types in one container. Collection containers must be compatible with the waste being stored. | | | |

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| <p>Poor waste container labeling, (1)(c), (1)(d): Container labels need to indicate a dangerous waste, the waste name, hazards, and the date waste was first placed in the container.</p> <p>Open when not in use, (1)(b) and by reference 630(5)(a): Dangerous waste containers must be closed except when adding or removing wastes.</p> <p>No secondary containment, (1)(b) and by reference 630(7): Dangerous waste accumulation areas must have a containment system to catch leaks or spills.</p> <p>Improper storage practices, (2): Dangerous waste collection containers must be easily accessible and stored to prevent spills.</p> | <p>(corrosive, ignitable), and the date waste was first added. Ensure the labels are visible and legible.</p> <ul style="list-style-type: none"> • Keep securely closed except to add or remove waste. If wastes are added frequently, consider using a funnel with a latching lid. • Provide secondary containment for all dangerous wastes being stored. • Store wastes according to the Uniform Fire Code: ignitable in flammable cabinets; reactive separate from organics; bases separate from acids. • Locate satellite accumulation areas near waste generation areas. • Do not stack satellite waste collection containers on top of each other. • Arrange so incompatible wastes cannot come in contact with each other. | |
| Illegal Disposal and Discharges | | |
| <p>Dangerous waste disposed to the drain or garbage, WAC 173-303-141(1): Designated dangerous waste must be disposed at a treatment, storage, or disposal facility (TSD) operating under a permit for a facility authorized to receive dangerous waste.</p> <p>Treated wastes disposed to a drain, WAC 173-303-950(2): Dangerous waste cannot be treated (neutralized, solidified, etc.) and discharged to a septic system or sanitary sewer system.</p> | <ul style="list-style-type: none"> • Use the appropriately labeled accumulation container to collect dangerous wastes. • Do not dispose dangerous waste in garbage cans. • Do not dilute, neutralize, or solidify aqueous dangerous wastes and then pour them down the drain. • Do not leave unused volatile organic reagents in the fume hood to evaporate. Store in appropriately closed containers for use at a later time. | |

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| Dilution is not the solution , WAC 173-303-150: Dangerous wastes cannot be divided or diluted and discharged to a septic system or sanitary sewer system to avoid regulation. | | | |
| Wastes evaporated in fume hoods , WAC 173-303-141(1): Do not leave unused analytical reagents or liquids in fume hoods to evaporate. | | | |

Notes, Comments, Follow-up